

ill-conceived motions to dismiss in other cases is immaterial to the situation at hand.

As set forth in Defendants' original motions, and confirmed in Plaintiff's opposition briefs and Defendants' replies, Plaintiff has failed, for multiple reasons, to meet the *Twombly-Iqubal* standard or otherwise adequately plead her claims. Dismissal pursuant to Rule 12(b)(6) is appropriate and warranted.

October 2, 2013.

/s/ Todd H. Stanton

Todd H. Stanton

Georgia Bar No. 675425

todd.stanton@stantonlawllc.com

*Counsel for Mark Braddock and Key Asset
Solutions, LLC*

STANTON LAW LLC
1579 Monroe Drive
Suite F206
Atlanta, Georgia 30324
404.881.1288

/s/ Kevin A. Maxim

Kevin A. Maxim

Georgia Bar No. 478580

kmaxim@maximlawfirm.com

*Counsel for ARC Auto Brokers, LLC,
and Alina Clerie*

THE MAXIM LAW FIRM, PC
1718 Peachtree Road, Suite 599
Atlanta, Georgia 30309
404-942-4272

CERTIFICATE OF FONT

This is to certify that the within and foregoing pleading has been prepared using Times New Roman, 14 point, font which has been approved by the Court in L.R. 5.1C.

/s/ Todd Stanton
Todd Stanton

